

EXHIBIT 13

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

H. KEVIN KNUSSMAN,

:

Plaintiff,

:

v.

: Civil Action No. AMD-95-1255

STATE OF MARYLAND, *et al.*,

:

Defendants.

:

* * * * 0000000 * * * *

DECLARATION OF JEFFERSON V. WRIGHT

1. I, Jefferson V. Wright, am over the age of eighteen and am competent to testify to the facts in this declaration.

2. I am a principal in the law firm of Miles & Stockbridge, where I am the head of the Commercial and Business Litigation group. I have been a member of the bar of Maryland since 1981. I have extensive experience with complex civil litigation, including experience with civil rights suits and other litigation involving constitutional claims or issues.

3. I have been informed that Mr. Knussman is seeking attorneys' fees of \$275 an hour for four attorneys, three of whom graduated from law school in 1986 (Ms. Jeon, Ms. Mandelbaum, and Mr. Freeman) and one in 1980 (Mr. Cockey).

4. That rate is substantially below what Miles & Stockbridge charges our fee-paying clients for Baltimore litigators of similar experience and is well within the market rate in Baltimore and Maryland for such services.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge.

May 19, 2004



Jefferson V. Wright